

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

DEBORAH YOUNG, as Personal Representative)
of the Estate of Gwendolyn Young, deceased,)

Plaintiff,

VS.

CORRECTIONAL HEALTHCARE
COMPANIES, INC., and
ANDREW ADUSEI, M.D.,

Defendants.

Case No.: 13-CV-315-JED-JFJ

JURY TRIAL DEMANDED ATTORNEY LIEN CLAIMED

PLAINTIFF'S FINAL EXHIBIT LIST

COMES NOW Plaintiff, Deborah Young (“Plaintiff”), as the Personal Representative of the Estate of Gwendolyn Young (“Ms. Young”), deceased, and respectfully submits the following Final Exhibit List:

Ex.	Description
1	Advanced Medical Systems 2011 03394
2	Aug 2013 Staff Minutes 04312
3	CHC & TCSO Agreement 02609
4	CHC 2005 Agreement 02817
5	CHC 2005 Renewal Agreement 02821
6	CHC 2007 Agreement 02844
7	CHC 2008 contract amendment 02846
8	CHC 2008-2009 Contract 02848
9	CHC 2011 Renewal Agreement 02807
10	CHC Agreement 02634

11	CHC Contract Revilla00032
12	CHC Contract 02800
13	CHC Contract renewal 02849
14	CHC Contract renewal 02850
15	CHC Contract Revilla 00025
16	EXHIBIT WITHDRAWN
17	CHC Policy and Procedures 00133
18	CHC Policy and Procedures 00205
19	CHC Policy and Procedures 00212
20	CHC Policy and Procedures 00090
21	CHC Policy and Procedures 00110
22	CHC Policy and Procedures 00160
23	CHC Policy and Procedures 00246
24	CHC Policy and Procedures 00272
25	DLM Inmate Handbook 02210
26	DOC letter to Tim Harris 02842
27	Jail Inspector complaints 04200
28	JAIL inspector complaint reports 04080
29	JAIL Inspector Deficiencies reports 04008
30	Josh Turley email 04606
31	Josh Turley email 04773
32	Josh Turley email 04979
33	Josh Turley email 05268
34	May 07, 2014 Staff minutes 04311

35	RFP30 Metcalf Copy
36	NCCHC 2010 probation 04248
37	NCCHC Washburn Letter 03778_Redacted
38	TCSO Policies All Chapters 1-25
39	Letter from Inmate Mica Shoate
40	Beane Report
41	Young Incident Report
42	Jail Shift Report -- SHU
43	Clinical Protocol Manual 2010
44	Young CHC records 05212
45	Young ME report 05257
46	Comments April 2012 CHC Audit
47	RFP6 CHC Term Letter
48	RFP7 Policies
49	AMS Report w. Names Redacted
50	RFP8 Staffing Matrix
51	3-7.1.07 to 6.30.08- Tulsa Co, OK Resolution for Extension
52	4-7.1.08 to 6.30.09- Tulsa Co, OK Resolution for Extension
53	6-9.1.10 to 6.30.11 Tulsa Co, OK Agreement
54	7- 07.01.11 to 06.30.12 Tulsa Co, OK Resolution for Contract Renewal
55	7.1.2008 to 6.30.2009 Tulsa Co, OK- Amd
56	Email from Doug Wilson to Brian Edwards re CHC- CHM Contract 3-13-12
57	8- 7.01.11 to 06.30.12 Tulsa, OK Amd to Resolution for Contract Renewal
58	9- 7.1.12 to 6.30.13- Tulsa Co., OK- Amd (Name Change, Staffing, Comp and Term)

59	10-7.1.13 to 6.30.14 (Month-to-month) Tulsa Co., OK- Amd (Term)
60	CHC Ltr to Roemer re April 2012 Audit- 6-13-12
61	ICE Report
62	NCCHC 2007
63	NCCHC 2010
64	Critical Findings- 6.12.12
65	Ltr from Raymond Herr to Edwards re: Plans of Action for Enhancement of Medical and Psychological Services 3.23.12
66	Issues to be Discussed Memo
67	Elliott Williams Video (Cell #1)
68	Tammy Harrington Documents
69	Adusei Report Bowman to Robinette
70	Wyrick Email
71	Gondles Report
72	Specific CHC Clinical Protocols
73	Young Video Part 1
74	Young Videos
75	Adusei Licensure Order
76	Memo From Lillard to Edawards, 9/26/11
77	Burke-Williams Verdict Form
78	Burke-Williams Judgment
79	Burke-Williams Tenth Circuit Opinion
80	Death Certificate (Young)
81	ME Report (Young) GLANZ-Revilla05251
82	Salgado Opinion Denying MSJ

83	Brown Opinion Denying MSJ
*	Any Exhibit listed by a Defendant and not objected to by Plaintiff.

Plaintiff has reserved the right to amend or supplement this trial exhibit list to the greatest extent allowed by the Court. Plaintiff has further reserved all rights to withdraw exhibits on her trial exhibit list, and to correct, delete and/or substitute any exhibits listed in error. Further, Plaintiff has reserved the right to use any document, even if not designated as an exhibit, for the purposes of rebuttal, cross-examination and/or impeachment.

Respectfully submitted,

s/Robert M. Blakemore
 Robert M. Blakemore, OBA #18656
 bobbblakemore@ssrok.com
 Daniel Smolen, OBA #19943
 danielsmolen@ssrok.com
 Bryon Helm, OBA #33003
 bryonhelm@ssrok.com
 SMOLEN & ROYTMAN
 701 South Cincinnati Avenue
 Tulsa, OK 74119
 Phone: (918) 585-2667
 Fax: (918) 585-2669

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on the 14th day of October 2021, I electronically transmitted the foregoing document to the Clerk of the Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to all ECF registrants who have appeared in this case.

s/Robert M. Blakemore

